

# **EXHIBIT A**

**Eva, Alyx**

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**From:** Eva, Alyx  
**Sent:** Friday, January 28, 2022 2:47 PM  
**To:** Jonathan Brush; Amy Demmler; Rick Morris; Jennifer Cronkhite  
**Cc:** Tizraves, Roxanne; Petree, Nicholas; Michael N. Turnage Young; Mahogane Reed; Hightower, Christina; Victor Jones; Romane Paul; Tomalty, Conor; Walter Jean-Jacques  
**Subject:** RE: Arnold/Bradford v. BHISD - 30(b)(6) Follow Up

Counsel,

I wanted to follow up on the 30(b)(6) stipulation. Please let us know if you've reviewed and have comments.

Thank you,  
Alyx

**Alyx E. Eva**  
**AKIN GUMP STRAUSS HAUER & FELD LLP**  
Direct: [+1 713.250.2160](tel:+1713.250.2160) | Internal: [12160](#)

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**From:** Eva, Alyx  
**Sent:** Monday, January 24, 2022 5:53 PM  
**To:** 'Jonathan Brush' <[jbrush@rmgllp.com](mailto:jbrush@rmgllp.com)>; 'Amy Demmler' <[ademmler@rmgllp.com](mailto:ademmler@rmgllp.com)>; 'Rick Morris' <[rmorris@rmgllp.com](mailto:rmorris@rmgllp.com)>; 'Jennifer Cronkhite' <[jcronkhite@rmgllp.com](mailto:jcronkhite@rmgllp.com)>  
**Cc:** Tizraves, Roxanne <[rtizraves@akingump.com](mailto:rtizraves@akingump.com)>; Petree, Nicholas <[npetree@akingump.com](mailto:npetree@akingump.com)>; 'Michael N. Turnage Young' <[mturnageyoung@naacpldf.org](mailto:mturnageyoung@naacpldf.org)>; 'Mahogane Reed' <[mreed@naacpldf.org](mailto:mreed@naacpldf.org)>; Hightower, Christina <[chightower@akingump.com](mailto:chightower@akingump.com)>; 'Victor Jones' <[vjones@naacpldf.org](mailto:vjones@naacpldf.org)>; 'Romane Paul' <[rpaul@naacpldf.org](mailto:rpaul@naacpldf.org)>; Tomalty, Conor <[ctomalty@akingump.com](mailto:ctomalty@akingump.com)>; 'Walter Jean-Jacques' <[wjean-jacques@naacpldf.org](mailto:wjean-jacques@naacpldf.org)>  
**Subject:** RE: Arnold/Bradford v. BHISD - 30(b)(6) Follow Up

Counsel,

Following up here again. Let us know if you have comments or if we may sign on your behalf.

Thank you,  
Alyx

**Alyx E. Eva**  
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**From:** Eva, Alyx  
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**Cc:** Tizraves, Roxanne <[rtizraves@akingump.com](mailto:rtizraves@akingump.com)>; Petree, Nicholas <[npetree@akingump.com](mailto:npetree@akingump.com)>; 'Michael N. Turnage Young' <[mturnageyoung@naacpldf.org](mailto:mturnageyoung@naacpldf.org)>; 'Mahogane Reed' <[mreed@naacpldf.org](mailto:mreed@naacpldf.org)>; Hightower, Christina <[chightower@akingump.com](mailto:chightower@akingump.com)>; 'Victor Jones' <[vjones@naacpldf.org](mailto:vjones@naacpldf.org)>; 'Romane Paul' <[rpaul@naacpldf.org](mailto:rpaul@naacpldf.org)>; Tomalty, Conor <[ctomalty@akingump.com](mailto:ctomalty@akingump.com)>; 'Walter Jean-Jacques' <[wjean-jacques@naacpldf.org](mailto:wjean-jacques@naacpldf.org)>  
**Subject:** RE: Arnold/Bradford v. BHISD - 30(b)(6) Follow Up

Hi Jonathan,

Following up again, please let us know if you agree to the proposed stipulation or have any comments.

Thank you,  
Alyx

**Alyx E. Eva**  
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**From:** Eva, Alyx  
**Sent:** Friday, January 14, 2022 1:31 PM  
**To:** 'Jonathan Brush' <[jbrush@rmgllp.com](mailto:jbrush@rmgllp.com)>; Amy Demmler <[ademmler@rmgllp.com](mailto:ademmler@rmgllp.com)>; Rick Morris <[rmorris@rmgllp.com](mailto:rmorris@rmgllp.com)>; Jennifer Cronkhite <[jcronkhite@rmgllp.com](mailto:jcronkhite@rmgllp.com)>  
**Cc:** Tizravesh, Roxanne <[rtizravesh@akingump.com](mailto:rtizravesh@akingump.com)>; Petree, Nicholas <[npetree@akingump.com](mailto:npetree@akingump.com)>; Michael N. Turnage Young <[mturnageyoung@naacpldf.org](mailto:mturnageyoung@naacpldf.org)>; Mahogane Reed <[mreed@naacpldf.org](mailto:mreed@naacpldf.org)>; Hightower, Christina <[chightower@akingump.com](mailto:chightower@akingump.com)>; Victor Jones <[vjones@naacpldf.org](mailto:vjones@naacpldf.org)>; Romane Paul <[rpaul@naacpldf.org](mailto:rpaul@naacpldf.org)>; Tomalty, Conor <[ctomalty@akingump.com](mailto:ctomalty@akingump.com)>; Walter Jean-Jacques <[wjean-jacques@naacpldf.org](mailto:wjean-jacques@naacpldf.org)>  
**Subject:** RE: Arnold/Bradford v. BHISD - 30(b)(6) Follow Up

Hi Jonathan,

Following up on the stipulation, please let us know if you have any comments or if we may sign on your behalf.

Thank you,  
Alyx

**Alyx E. Eva**  
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**From:** Jonathan Brush <[jbrush@rmgllp.com](mailto:jbrush@rmgllp.com)>  
**Sent:** Monday, January 10, 2022 3:46 PM  
**To:** Eva, Alyx <[aeva@akingump.com](mailto:aeva@akingump.com)>; Amy Demmler <[ademmler@rmgllp.com](mailto:ademmler@rmgllp.com)>; Rick Morris <[rmorris@rmgllp.com](mailto:rmorris@rmgllp.com)>; Jennifer Cronkhite <[jcronkhite@rmgllp.com](mailto:jcronkhite@rmgllp.com)>  
**Cc:** Tizravesh, Roxanne <[rtizravesh@akingump.com](mailto:rtizravesh@akingump.com)>; Petree, Nicholas <[npetree@akingump.com](mailto:npetree@akingump.com)>; Michael N. Turnage Young <[mturnageyoung@naacpldf.org](mailto:mturnageyoung@naacpldf.org)>; Mahogane Reed <[mreed@naacpldf.org](mailto:mreed@naacpldf.org)>; Hightower, Christina <[chightower@akingump.com](mailto:chightower@akingump.com)>; Victor Jones <[vjones@naacpldf.org](mailto:vjones@naacpldf.org)>; Romane Paul <[rpaul@naacpldf.org](mailto:rpaul@naacpldf.org)>; Tomalty, Conor <[ctomalty@akingump.com](mailto:ctomalty@akingump.com)>; Walter Jean-Jacques <[wjean-jacques@naacpldf.org](mailto:wjean-jacques@naacpldf.org)>  
**Subject:** Re: Arnold/Bradford v. BHISD - 30(b)(6) Follow Up

**\*\*EXTERNAL Email\*\***

Thank you, Alyx. We will review and get back to you soon.

Jonathan G. Brush  
Partner  
Board Certified – Civil Appellate Law  
Texas Board of Legal Specialization

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**From:** "Eva, Alyx" <[aeva@akingump.com](mailto:aeva@akingump.com)>  
**Date:** Monday, January 10, 2022 at 11:34 AM  
**To:** Jonathan Brush <[jbrush@rmgllp.com](mailto:jbrush@rmgllp.com)>, Amy Demmler <[ademmler@rmgllp.com](mailto:ademmler@rmgllp.com)>, Rick Morris <[rmorris@rmgllp.com](mailto:rmorris@rmgllp.com)>, Jennifer Cronkite <[jcronkhite@rmgllp.com](mailto:jcronkhite@rmgllp.com)>  
**Cc:** "Tizraves, Roxanne" <[rtizraves@akingump.com](mailto:rtizraves@akingump.com)>, "Petree, Nicholas" <[npetree@akingump.com](mailto:npetree@akingump.com)>, "Michael N. Turnage Young" <[mturnageyoung@naacpldf.org](mailto:mturnageyoung@naacpldf.org)>, Mahogane Reed <[mreed@naacpldf.org](mailto:mreed@naacpldf.org)>, "Hightower, Christina" <[chightower@akingump.com](mailto:chightower@akingump.com)>, Victor Jones <[vjones@naacpldf.org](mailto:vjones@naacpldf.org)>, Romane Paul <[rpaul@naacpldf.org](mailto:rpaul@naacpldf.org)>, "Tomalty, Conor" <[ctomalty@akingump.com](mailto:ctomalty@akingump.com)>, Walter Jean-Jacques <[wjean-jacques@naacpldf.org](mailto:wjean-jacques@naacpldf.org)>  
**Subject:** Arnold/Bradford v. BHISD - 30(b)(6) Follow Up

Jonathan,

We wanted to follow up after our call on Tuesday regarding Plaintiffs' 30(b)(6) notice.

**Time Period Issue:**

You raised a concern with the time period requested in the 30(b)(6) notice. We maintain that the time period of our requests is proper and relevant, given the case law on both race and sex discrimination claims. However, as Nick mentioned after Mrs. Arnold's deposition, if it would save time in the upcoming depositions, we propose entering into a stipulation. Please find a draft stipulation attached.

**Request No. 19:**

We confirmed that this request is related to discipline and only seeks information about grievances related to discipline. Additionally, we had discussed you taking a look at the total number of grievances BHISD has on file, please let us know once you determine that number.

**Request No. 26:**

We have adjusted our language in Request No. 26 to "Any instances of actual or alleged prejudice, bias, or intolerance concerning sex or race by BHISD students or any BHISD Representative from the 2014-2015 school year to present" in light of your concerns. We will circulate an amended deposition notice.

Let us know if you would like to hop on another phone call to discuss.

Thank you,  
Alyx

**Alyx E. Eva**

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